

JAP:DAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 12- 160**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

SAMUEL PRASHARD

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DEREK BERGMAN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about February 12, 2012, within the Eastern District of New York and elsewhere, defendant SAMUEL PRASHAD did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

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The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about February 12, 2012, the defendant SAMUEL PARSHARD arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard BWIA Flight No. 526 from Georgetown, Guyana.

2. The defendant SAMUEL PARSHARD was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection a brown Jing Dian bag, tag # 0106 BW 828749. The defendant claimed ownership of the bag and its contents.

3. During the inspection, the bag was emptied, but the officer observed that the bag still remained extremely heavy. The bag was then probed on the side and a white powdery substance was discovered, which field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine found in the defendant SAMUEL PARSHARD's bag is 5,092.9 grams.

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that  
defendant SAMUEL PARSHARD be dealt with according to law.



DEREK BERGMAN  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
13th day of February, 2012

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